

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

C. PEPPER LOGISTICS, LLC, et al.,)	
)	
Plaintiffs,)	
)	Case No.: 4:20-cv-01444
v.)	
)	
LANTER DELIVERY SYSTEMS, LLC, et)	
al.,)	
)	
Defendants.)	

**DECLARATION OF ANTOINE WINGARD PURSUANT TO
28 U.S.C. § 1746**

I, Antoine Wingard, declare as follows under 28 U.S.C § 1746:

1. I am the age of majority, and I am competent to make this declaration.
2. I make this declaration based on my personal knowledge and observations.
3. I began working for Logistic Resources Solutions, Inc. ("LRS"), in or around 2016 as the Transportation Manager of the Charlotte, North Carolina area.
4. At all times while working for LRS, I lived and worked in North Carolina.
5. I never traveled to Missouri to perform any LRS job duties. My job duties consisted of managing the Charlotte, North Carolina terminal, deliveries, and drivers. To the best of my recollection, I did not oversee any loads traveling to Missouri, and therefore, I did not interact with anyone from Missouri to perform my job duties.
6. To the best of my recollection, the last time I visited Missouri was close to two years ago for a church conference.
7. LRS was, and to my knowledge is, an Illinois corporation.
8. I performed my day to day job responsibilities for LRS in Charlotte, North Carolina.
9. The last date I performed services for LRS was on or around August 22, 2020. My employment with LRS ended that day.
10. August 22, 2020, was the first time I learned that Lanter Delivery Systems, LLC would no longer be doing business with C. Pepper Logistics, LLC et al. This was told to me

around 4-5 a.m. I was told this via telephone call from an individual who was not located in the state of Missouri. Prior to being informed of this, I knew nothing about the cessation of LRS's – or any C. Pepper Logistics, LLC affiliate's – business operations.

11. Prior to the end of my employment with LRS, I never communicated with Lanter Delivery Systems, LLC, White Line Systems, LLC, or Darien Brokerage, LLC employees or representatives concerning any orchestration of activities that would lead to the cessation of LRS's – or any C. Pepper Logistics, LLC affiliate's – business operations.
12. I had no role in the alleged conspiracy or plot described in the Petition of the above-captioned case.
13. I did not take any confidential or proprietary information from LRS or its affiliates upon my termination of employment with LRS.
14. I did not provide any confidential or proprietary information of LRS or its affiliates to any other business.
15. With respect to the only specific allegation pertaining to me in the Petition, paragraph 68:
 - a. I was in charge of payroll for the Charlotte drivers working for C. Pepper Logistics, LLC affiliate(s). Their livelihood depended on me.
 - b. Payroll was due on Saturday, August 22, 2020. As a result, and as standard procedure, I emailed payroll to Independent Service Providers, LLC.
 - c. As I was informed of the change in providers that day, I asked a Lanter employee – Jeff Pentecost – who was not located in the state of Missouri, if I should provide the payroll to anyone else given the transition. I was told that the C. Pepper Logistics, LLC/Independent Service Providers, LLC were still responsible for payroll, but there have been threats that they were not going to pay.
 - d. As a result, and because I was fearful of my drivers not getting paid, I sent record of the required payroll (for my North Carolina drivers) to Jeff Pentecost.
 - e. Jeff Pentecost is not officed in St. Louis County, Missouri. He lives and works in the Dallas, Texas area.
 - f. This payroll was not confidential or proprietary. This payroll is routinely seen by Lanter Delivery Systems, LLC. Indeed, Lanter set the payroll in the first place in the contract with C. Pepper Logistics, LLC affiliate(s).
 - g. C. Pepper Logistics, LLC affiliate(s) refused to pay the North Carolina drivers the payroll I sent on August 22, 2020.

16. I do not currently reside in Missouri and have never resided in Missouri.
17. I do not own, lease, or possess property – real or personal – that is located in Missouri.
18. I do not have a bank account in Missouri.
19. I have not availed myself to the state or Federal courts of Missouri.
20. I have never had any ownership interest in any business based in Missouri.
21. LRS failed to pay me wages for the work I performed from August 17, 2020, through August 22, 2020.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge.

11/4/2020

Executed on _____

DocuSigned by:



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Antoine Wingard